

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

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In re:

Chapter 7  
Case No.: 1-11-42390-jbr

IMAGE RENT A CAR, INC.,

**NOTICE OF MOTION**

Debtor(s)  
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PLEASE TAKE NOTICE that upon the annexed motion, Digby Adler Group, LLC., d/b/a/ Bandago, a creditor in the above-captioned Chapter 7 case, moves this Court before the Honorable Joel B. Rosenthal, United States Bankruptcy Judge, in the United States Bankruptcy Court for the Eastern District of New York, 271 Cadman Plaza East, Brooklyn, New York 11201, on February 6, 2012 at 2:00 p.m., or as soon thereafter as counsel may be heard, for an Order:

(a) Compelling discovery pursuant to Rule 7037 of the Federal Rules of Bankruptcy Procedure and Rule 37(a) of the Federal Rules of Civil Procedure;

(b) Awarding appropriate sanctions pursuant to Rule 7037 of the Federal Rules of Bankruptcy Procedure and Rule 37(b) of the Federal Rules of Civil Procedure;

(c) Awarding expenses incurred in making this motion, including attorney's fees, pursuant to Rule 7037 of the Federal Rules of Bankruptcy Procedure and Rule 37(a) of the Federal Rules of Civil Procedure; and

(d) For such other and further relief as this Court deems just, appropriate and equitable.

PLEASE TAKE FURTHER NOTICE that any answering papers shall be served so as to be received not later than seven (7) days before the hearing date, pursuant to Local Rule 9006-1.

Dated: New York, New York  
January 4, 2012

\_\_\_\_\_/s/\_\_\_\_\_  
**By: DANIEL GERSHBURG**  
DANIEL GERSHBURG ESQ., P.C.  
Attorneys for Creditor  
Digby Adler Group, L.L.C., d/b/a Bandago  
100 Church Street, 8<sup>th</sup> Floor  
New York, New York 10007  
(718)989-0765

Cc: Joseph Y. Balisok, Esq.  
Law Office of Joseph Y. Balisok, LL.M., P.C.  
Attorney for Debtors  
Van Rental Co., Inc. and Image Rent A Car, Inc.  
1650 Eastern Parkway, Suite 303  
Brooklyn, NY 11233  
(718) 928-9607